

EXHIBIT A

Redlined Comparison of Original Complaint and Proposed First Amended Complaint

Case No.: 3:24-cv-00526-ART-CSD

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA – NORTHERN DIVISION

DREW RIBAR,

Plaintiff,

v.

WASHOE COUNTY; BUILD OUR CENTER, INC.; et al.,

Defendants.

Submitted in Support of:

PLAINTIFF'S MOTION FOR LEAVE TO FILE FIRST AMENDED COMPLAINT

Date: March 24, 2025



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Left document: 2024-11-20 Filed Complaint 3 24-cv-00526.pdf

Right document: 2025-03-23 Amended Complaint.pdf

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Is there a specific way I should view this file?

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Why are there blank pages?

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How do I read the changes?

Text deleted from the left document and, hence, not in right document is highlighted red. Text added to the right document and, hence, not in left document is highlighted green.

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and Amount \$ 405.00 Date

NOV 20 2024

Receipt # 3-0730 Initials DS

Filed	Received	Entered	Served On
Counsel/Parties of Record			

NOV 20 2024

Clerk US District Court
District of Nevada

By: _____ Deputy

Drew J. Ribar
3480 Pershing Ln
Washoe Valley NV 89704
775-223-7899
Const2Audit@gmail.com
Pro Se

UNITED STATES DISTRICT COURT**DISTRICT OF NEVADA****NORTHERN DIVISION**

DREW RIBAR, PLAINTIFF,

Plaintiff,

vs.

WASHOE COUNTY, NEVADA; WASHOE
COUNTY LIBRARY SYSTEM; BUILD OUR
CENTER, INC.; JEFF SCOTT; STACY
MCKENZIE; JONNICA BOWEN; LIBRARY
EMPLOYEE DOE #1; JENNIFER COLE;
DEPUTY C. ROTHKIN (BADGE #4696);
DEPUTY R. SAPIDA (BADGE #4663); SGT.
GEORGE GOMEZ (BADGE #4066); AND
JOHN/JANE DOES 1-10,,

Defendant

Case No.: **3:24-cv-00526**

**COMPLAINT FOR VIOLATIONS OF
CONSTITUTIONAL RIGHTS
(42 U.S.C. § 1983, NEVADA
CONSTITUTION, NRS 379.040, AND
RELATED CLAIMS)**

INTRODUCTION

1. Plaintiff, an independent journalist, brings this action under 42 U.S.C. § 1983 and Nevada state law to redress violations of his constitutional rights, including the First, Fourth, and Fourteenth Amendments to the United States Constitution and the Nevada Constitution.
2. Defendants unlawfully restricted Plaintiff's access to public library spaces, retaliated against him for engaging in protected First Amendment activities, imposed

COMPLAINT FOR VIOLATIONS OF CONSTITUTIONAL RIGHTS(42 U.S.C. § 1983, NEVADA
CONSTITUTION, NRS 379.040, AND RELATED CLAIMS) - 1

1 UNITED STATES DISTRICT COURT

2 DISTRICT OF NEVADA

3
4 DREW J. RIBAR,

5 Plaintiff, Pro Se

6 3480 Pershing Ln

7 Washoe Valley, NV 89704

8 (775) 223-7899

9 Const2Audit@gmail.com

10
11
12
13 v.

14
15 WASHOE COUNTY, WASHOE COUNTY LIBRARY SYSTEM, JEFF SCOTT, THANH

16 NGUYEN, JAMIE HEMINGWAY, BEATE WEINERT, STACY MCKENZIE, JONNICA

17 BOWEN, BEN WEST, BUILD OUR CENTER, INC., STACEY SPAIN, ANGELINE

18 PETERSON, CHRISTOPHER DANIELS, DEPUTIES ROTHKIN, SAPIDA, GOMEZ,

19 KRISTEN RYAN, JENNIFER COLE, and JOHN/JANE DOES 1-10,

20 Defendants.

21
22
23 Case No.: 3:24-cv-00526-ART-CLB

24
25
26 AMENDED COMPLAINT FOR VIOLATIONS OF CONSTITUTIONAL RIGHTS AND

27 STATE LAW

28 PLEADING TITLE - I

1 unconstitutional restrictions, improperly demanded his identification without reasonable
2 suspicion, and failed to provide procedural safeguards, resulting in harm.

- 3 3. Plaintiff seeks declaratory and injunctive relief, compensatory and punitive damages, and
4 attorneys' fees and costs under 42 U.S.C. § 1988.
5
6

7
8 **JURISDICTION AND VENUE**
9

- 10 4. This Court has jurisdiction over Plaintiff's federal claims under 28 U.S.C. §§ 1331 and
11 1343(a)(3). Supplemental jurisdiction over state-law claims is proper under 28 U.S.C. §
12 1367.
13

- 14 5. Venue is proper in the Northern Division of the District of Nevada under 28 U.S.C. §
15 1391(b), as the events giving rise to the claims occurred in Washoe County, Nevada.
16

17
18 **PARTIES**
19

20 **Plaintiff**
21

- 22 6. **Drew Ribar:** A resident of Washoe County, Nevada, and an independent journalist.
23

24 **Defendants**
25

- 26 7. Defendants include Washoe County, the Washoe County Library System, and individuals
27 as detailed below:

JURY TRIAL DEMANDED

INTRODUCTION

1. Plaintiff, Drew J. Ribar, an independent journalist operating "Auditing Reno 911," brings this action under 42 U.S.C. §§ 1983, 1985(3), the Nevada Constitution, and state law against Defendants for systematic violations of his First, Fourth, and Fourteenth Amendment rights while documenting Washoe County Library System (WCLS) events.
2. Defendants censored Plaintiff's speech, blocked him from social media, assaulted him, detained him without suspicion, imposed baseless suspensions, and defamed him, as evidenced by 32 exhibits (EXH001-EXH317).
3. Plaintiff seeks \$17,000,000 in damages (\$5,000,000 compensatory, \$12,000,000 punitive), nominal damages, injunctive relief to restore social media access and reform WCLS policies, and attorney fees to deter future misconduct.

JURISDICTION AND VENUE

4. This Court has jurisdiction under 28 U.S.C. §§ 1331 (federal question), 1343(a)(3) (civil rights), and supplemental jurisdiction over state claims under 28 U.S.C. § 1367.
5. Venue is proper under 28 U.S.C. § 1391(b) as all events occurred in Washoe County, Nevada, within this judicial district.

PARTIES

6. Plaintiff: Drew J. Ribar, a resident of Washoe Valley, Nevada, operates "Auditing Reno 911," a YouTube channel documenting government activities.

- 1 ○ **Washoe County:** Responsible for the actions of its employees, including the
- 2 Washoe County Library System staff and deputies of the Washoe County
- 3 Sheriff's Office.
- 4
- 5 ○ **Washoe County Library System:** Operates public libraries and is responsible for
- 6 policies impacting public access and free speech rights.
- 7 ○ **Build Our Center, Inc.:** A Nevada nonprofit organization that collaborated with
- 8 the Library System to organize events and acted in joint participation with state
- 9 actors under **Lugar v. Edmondson Oil Co.**, 457 U.S. 922 (1982).
- 10
- 11 ○ **Jeff Scott (Library Director):**
- 12 ▪ Directed and approved unconstitutional practices, including blocking
- 13 Plaintiff on the Library's Facebook page under **Davison v. Randall**, 912
- 14 F.3d 666 (4th Cir. 2019), denying Plaintiff access to library spaces in
- 15 violation of **Kreimer v. Bureau of Police**, 958 F.2d 1242 (3d Cir. 1992),
- 16 and physically assaulting Plaintiff.
- 17
- 18 ○ **Stacy McKenzie (Assistant Library Director):**
- 19 ▪ Assisted in enforcing policies excluding Plaintiff from public library
- 20 spaces.
- 21 ▪ Denied Plaintiff's appeal of a one-year restriction imposed after the June
- 22 15, 2024, North Valleys Library incident.
- 23
- 24 ○ **Jonnica Bowen (Library Manager):**
- 25 ▪ Supported the one-year restriction against Plaintiff, misrepresenting his
- 26 conduct in violation of his due process rights under **Armstrong v. D.C.**
- 27 **Public Library**, 154 F. Supp. 2d 67 (D.D.C. 2001).
- 28

7. Defendants:

- Washoe County: A political subdivision of Nevada, employer of WCLS and sheriff deputies.
- Washoe County Library System (WCLS): A public entity under Washoe County, managing library facilities.
- Jeff Scott: WCLS Library Director, personally involved in assaults and suspensions.
- Thanh Nguyen: WCLS Librarian, assaulted Plaintiff.
- Jamie Hemingway: WCLS Public Information Officer, restricted media access.
- Beate Weinert: WCLS employee, involved in event coordination.
- Stacy McKenzie: WCLS Assistant Director, enforced unlawful restrictions.
- Jonnica Bowen: WCLS Library Manager, issued trespass orders.
- Ben West: Washoe County Security Administrator, supported access restrictions.
- Build Our Center, Inc. (BOC): A private entity acting under color of law with WCLS.
- Stacey Spain: BOC Director, coordinated access restrictions.
- Angeline Peterson: BOC member, involved in event enforcement.
- Christopher Daniels: BOC member, involved in event enforcement.
- Deputies Rothkin, Sapida, Gomez: Washoe County Sheriff's deputies, detained Plaintiff.
- Kristen Ryan: WCLS employee, imposed suspensions.

1 ○ **Library Employee Doe #1:**

- 2 ▪ Repeatedly slammed a door against Plaintiff's foot on June 15, 2024,
3 causing harm in violation of **NRS 200.481**, and made a false report to law
4 enforcement that Plaintiff had injured her, jeopardizing Plaintiff's Fourth
5 Amendment rights under **Franks v. Delaware**, 438 U.S. 154 (1978).
6

7 ○ **Jennifer Cole (Library Employee):**

- 8 ▪ Called law enforcement on November 12, 2024, alleging Plaintiff was
9 trespassing, despite the absence of imminent danger or legal justification,
10 violating **Hiibel v. Sixth Judicial District Court of Nevada, Humboldt**
11 **County**, 542 U.S. 177 (2004).
12

13 ○ **Deputy C. Rothkin (Badge #4696), Deputy R. Sapida (Badge #4663), Sgt.**
14 **George Gomez (Badge #4066):**

- 15 ▪ Demanded Plaintiff's identification without reasonable suspicion of
16 criminal activity, violating **Terry v. Ohio**, 392 U.S. 1 (1968), and **Hiibel**,
17 542 U.S. 177.
18
19

20
21 **FACTUAL BACKGROUND**

22
23 **Access Denial and Retaliation**

24
25 8. On June 15, 2023, Plaintiff attempted to document Drag Queen Story Hour at the
26 Downtown Reno Library. Library staff denied Plaintiff access to the reading room
27 because he did not have a child with him, despite permitting access to other media
28
COMPLAINT FOR VIOLATIONS OF CONSTITUTIONAL RIGHTS(42 U.S.C. § 1983, NEVADA
CONSTITUTION, NRS 379.040, AND RELATED CLAIMS) - 4

- Jennifer Cole: WCLS employee, involved in supervision failures.
- John/Jane Does 1-10: Unknown agents of Defendants, liable for violations.

FACTUAL ALLEGATIONS

8. On May 12, 2022, WCLS officials coordinated staffing for Drag Queen Story Hour (DQSH) events, prioritizing Build Our Center (BOC) involvement (Exhibit 1, EXH001-EXH005).
9. On June 14, 2022, WCLS and BOC planned security for DQSH, restricting public access (Exhibit 2, EXH006-EXH010).
10. On June 24, 2022, Jamie Hemingway granted KUNR media access while excluding Plaintiff, evidencing viewpoint discrimination (Exhibit 3, EXH011-EXH012).
11. On June 28, 2022, WCLS increased security due to protests, further limiting public access (Exhibit 4, EXH013-EXH017).
12. From June 24 to July 2, 2022, WCLS and BOC coordinated Pride events, favoring specific groups (Exhibit 5, EXH018-EXH022).
13. From November 14-18, 2022, WCLS and BOC organized DQSH, showing preferential treatment (Exhibit 6, EXH023-EXH026).
14. On January 12, 2023, WCLS discussed handling Plaintiff's recordings, indicating intent to suppress (Exhibit 7, EXH027-EXH032).
15. From January 20 to February 1, 2023, WCLS and BOC planned DQSH logistics, reinforcing exclusionary policies (Exhibit 8, EXH033-EXH039).
16. On February 28, 2023, WCLS responded to media inquiries, deflecting censorship claims (Exhibit 9, EXH040-EXH044).

1 representatives. The denial violated Plaintiff's First Amendment rights to access public
2 forums under **Kreimer v. Bureau of Police**, 958 F.2d 1242, and Nevada's library access
3 law (**NRS 379.040**).

4
5 **Assault and Social Media Blocking**

6
7 9. On July 15, 2023, at the Sparks Library, Plaintiff was assaulted by Library Director Jeff
8 Scott, who pushed Plaintiff in an attempt to remove him from the premises. This physical
9 contact constituted a battery under **NRS 200.481**.

10
11 10. On the same day, Scott admitted to blocking Plaintiff from the Library's Facebook page,
12 in violation of **Davison v. Randall**, which established that government-operated social
13 media pages are designated public forums.

14
15 **False Allegations and Procedural Violations**

16
17 11. On June 15, 2024, at the North Valleys Library, Library Employee Doe #1 repeatedly
18 slammed a door against Plaintiff's foot, injuring him, and later contacted law
19 enforcement to report that Plaintiff had injured her. This false report jeopardized
20 Plaintiff's liberty and violated the Fourth Amendment under **Franks v. Delaware**, which
21 prohibits false information leading to government action.

22
23 12. Plaintiff was subsequently barred from accessing library services for one year without
24 notice or an opportunity to contest the restriction, violating his due process rights under
25 **Armstrong v. D.C. Public Library**.

26
27 **Improper Demand for Identification**

1 17. From February 27 to March 22, 2023, WCLS planned RainbowFest, excluding
2 public dissenters (Exhibit 10, EXH045-EXH061).

3 18. On April 26, 2023, WCLS and BOC coordinated volunteers for Pride and DQSH,
4 restricting access (Exhibit 11, EXH062-EXH063).

5 19. On May 5, 2023, WCLS and BOC discussed volunteer roles, further limiting public
6 participation (Exhibit 12, EXH064-EXH069).

7 20. On May 10, 2023, WCLS and Friends of the Library addressed public concerns,
8 maintaining exclusionary policies (Exhibit 13, EXH070-EXH071).

9 21. On June 7, 2023, WCLS planned DQSH security at Reno Library, prioritizing BOC
10 (Exhibit 14, EXH072-EXH074).

11 22. On June 15, 2023, at Reno Library DQSH, Jeff Scott and BOC blocked Plaintiff's
12 recording, confirming BOC as a state actor (Exhibit 27, Video 1).

13 23. On July 15, 2023, at Sparks Library DQSH, Scott assaulted Plaintiff (T/S 1:22:34)
14 and trespassed him, while BOC enforced selective access (Exhibit 28, Video 2).

15 24. On July 6, 2023, Plaintiff requested public records on library policies, met with
16 resistance (Exhibit 15, EXH075-EXH083).

17 25. On April 17, 2024, Plaintiff's LBOT comments were falsified in minutes,
18 misrepresenting his stance (Exhibits 16-17, EXH084, EXH085-EXH092).

19 26. On June 15, 2024, at North Valleys Library DQSH, Thanh Nguyen assaulted
20 Plaintiff (T/S 1:09:11), and staff trespassed him from public areas (Exhibit 29, Video
21 3).

1 13. On November 12, 2024, Library Employee Jennifer Cole called the Sheriff's Office,
2 alleging Plaintiff was trespassing without providing articulable facts of a crime. Deputies
3 Rothkin, Sapida, and Gomez demanded Plaintiff provide identification under NRS
4 171.123, despite lacking reasonable suspicion that Plaintiff was engaged in criminal
5 activity.
6

7 14. The deputies' actions violated **Hiibel v. Sixth Judicial District Court of Nevada,**
8 **Humboldt County**, which requires reasonable suspicion to justify such a demand, and
9 **Terry v. Ohio**, which protects against unreasonable seizures.
10

11
12
13 **CAUSES OF ACTION**

14
15 **COUNT I: VIOLATION OF 42 U.S.C. § 1983 (FIRST AMENDMENT)**

16
17 Defendants violated Plaintiff's First Amendment rights by:

- 18
- 19 • Blocking him from public discourse on the Library's Facebook page (**Davison v.**
20 **Randall**).
 - 21 • Denying him access to public library spaces during public events (**Kreimer v. Bureau of**
22 **Police**).
- 23

24
25 **COUNT II: VIOLATION OF 42 U.S.C. § 1983 (FOURTH AMENDMENT)**

26
27 Defendants violated Plaintiff's Fourth Amendment rights by:

28 COMPLAINT FOR VIOLATIONS OF CONSTITUTIONAL RIGHTS(42 U.S.C. § 1983, NEVADA
CONSTITUTION, NRS 379.040, AND RELATED CLAIMS) - 6

1 27. On June 20, 2024, at Reno Library, Kristen Ryan imposed a 365-day suspension
 2 without notice, with Ann Silver confirming Scott's prior assault (Exhibit 30, Video
 3 4).

4 28. On August 14-16, 2024, Plaintiff appealed his suspension, met with procedural
 5 irregularities and evidence denial (Exhibits 19-23, EXH143-EXH178).

6 29. On August 21, 2024, LBOT upheld Plaintiff's suspension with false claims, denying
 7 due process (Exhibit 31, Video 5; Exhibit 24, EXH190-EXH277).

8 30. On November 12, 2024, at South Valleys Library, deputies Rothkin, Sapida, and
 9 Gomez detained Plaintiff without suspicion, enforcing a baseless trespass claim
 10 (Exhibit 32, Video 6; Exhibit 26, EXH279-EXH311).

11 CAUSES OF ACTION

12 Count I: 42 U.S.C. § 1983 - First Amendment (All Defendants) 31.

13 Defendants censored Plaintiff's speech (Exhibits 3, 27-30), blocked him from WCLS social
 14 media (Packingham v. North Carolina, 582 U.S. 98 (2017); Knight First Amendment Inst.
 15 v. Trump, 928 F.3d 226 (2d Cir. 2019)), and excluded him from libraries (Kreimer v.
 16 Bureau of Police, 958 F.2d 1242 (3d Cir. 1992)).

17 Count II: 42 U.S.C. § 1983 - Fourth Amendment (Scott, Nguyen, Rothkin,
 18 Sapida, Gomez) 32. Defendants assaulted Plaintiff (Exhibits 28, T/S 1:22:34; 29, T/S
 19 1:09:11) and detained him without suspicion (Exhibit 32), violating Terry v. Ohio, 392 U.S.
 20 1 (1968); Hiibel v. Sixth Judicial Dist. Court, 542 U.S. 177 (2004); Florida v. Royer, 460
 21 U.S. 491 (1983).

22 Count III: 42 U.S.C. § 1983 - Fourteenth Amendment Due Process (WCLS,
 23 Scott, McKenzie, Bowen, Ryan) 33. Defendants imposed suspensions without notice or
 24

25 PLEADING TITLE - 6
 26
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- Demanding identification without reasonable suspicion (**Hiibel, Terry**).
- Physically assaulting Plaintiff under color of law (**NRS 200.481**).
- Making false reports to law enforcement (**Franks v. Delaware**).

COUNT III: VIOLATION OF 42 U.S.C. § 1983 (FOURTEENTH AMENDMENT – DUE PROCESS)

Defendants imposed a one-year restriction on Plaintiff without notice or an opportunity to contest (**Armstrong v. D.C. Public Library**).

COUNT IV: MONELL LIABILITY

Washoe County and the Library System are liable for the constitutional violations resulting from:

- Official policies blocking individuals on social media (**Monell v. Department of Social Services**, 436 U.S. 658 (1978)).
- Practices excluding the public from library spaces without legal authority.

COUNT V: VIOLATION OF NEVADA CONSTITUTION

Defendants violated Plaintiff's rights under Article I, Section 18 of the Nevada Constitution, as recognized in **Mack v. Williams**, 138 Nev. Adv. Op. 86 (2022).

COMPLAINT FOR VIOLATIONS OF CONSTITUTIONAL RIGHTS(42 U.S.C. § 1983, NEVADA CONSTITUTION, NRS 379.040, AND RELATED CLAIMS) - 7

1 hearing (Exhibits 19-24, 30-31) and falsified records (Exhibit 17), violating *Armstrong v.*
2 *D.C. Pub. Library*, 154 F. Supp. 2d 67 (D.D.C. 2001); *Mathews v. Eldridge*, 424 U.S. 319
3 (1976).

4 Count IV: 42 U.S.C. § 1983 - Fourteenth Amendment Equal Protection (All
5 Defendants) 34. Defendants selectively enforced policies against Plaintiff while favoring
6 DQSH supporters (Exhibits 1-14, 27-30), violating *Village of Willowbrook v. Olech*, 528
7 U.S. 562 (2000).

8 Count V: 42 U.S.C. § 1983 - Monell Liability (Washoe County, WCLS) 35.
9 Defendants maintained policies of censorship and exclusion (Exhibits 1-32), establishing
10 liability under *Monell v. Dep't of Soc. Servs.*, 436 U.S. 658 (1978).

11 Count VI: 42 U.S.C. § 1983 - Conspiracy (All Defendants) 36. Defendants
12 conspired to violate Plaintiff's rights through coordinated actions (Exhibits 1-3, 27-32),
13 meeting *Adickes v. S.H. Kress & Co.*, 398 U.S. 144 (1970).

14 Count VII: 42 U.S.C. § 1985(3) - Conspiracy to Violate Civil Rights (All
15 Defendants) 37. Defendants conspired to deprive Plaintiff of rights due to his viewpoint
16 (Exhibits 27-30), violating 42 U.S.C. § 1985(3).

17 Count VIII: Nevada Constitution, Art. 1, §§ 9, 10 (All Defendants) 38.
18 Defendants violated Plaintiff's speech and petition rights (Exhibits 1-32), per *Mack v.*
19 *Williams*, 138 Nev. Adv. Op. 86 (2022).

20 Count IX: NRS 379.040 - Public Library Access (WCLS, Scott, McKenzie,
21 Bowen, Nguyen, Hemingway, Weinert, West) 39. Defendants denied Plaintiff library access
22 (Exhibits 27-30), violating NRS 379.040.

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28 PLEADING TITLE - 7

COUNT VI: NEGLIGENCE AND ASSAULT

Defendants Jeff Scott and Library Employee Doe #1 committed battery against Plaintiff.

Defendant Jennifer Cole negligently involved law enforcement without imminent danger.

PRAYER FOR RELIEF

Plaintiff requests:

1. A declaratory judgment that Defendants violated his constitutional rights.
2. Injunctive relief preventing future constitutional violations.
3. Compensatory damages in an amount to be determined at trial.
4. Punitive damages against individual Defendants for willful and malicious conduct.
5. Attorneys' fees and costs under 42 U.S.C. § 1988.
6. Any other relief the Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff demands a trial by jury on all issues so triable.

Dated: November 18, 2024

Respectfully submitted,

COMPLAINT FOR VIOLATIONS OF CONSTITUTIONAL RIGHTS(42 U.S.C. § 1983, NEVADA
CONSTITUTION, NRS 379.040, AND RELATED CLAIMS) - 8

1 Count X: Assault and Battery (Scott, Nguyen) 40. Defendants assaulted
2 Plaintiff (Exhibits 28, T/S 1:22:34; 29, T/S 1:09:11), violating NRS 200.481.

3 Count XI: Intentional Infliction of Emotional Distress (All Defendants) 41.
4 Defendants' extreme conduct (Exhibits 27-32) caused severe emotional distress.

5 Count XII: Defamation (All Defendants) 42. Defendants falsely accused
6 Plaintiff of misconduct (Exhibit 24), harming his reputation.

7 Count XIII: Negligence/Negligent Supervision (Washoe County, WCLS,
8 Cole) 43. Defendants negligently supervised staff, leading to false reporting (Exhibit 32).

9 Count XIV: NRS 241.035 - Open Meeting Law (WCLS) 44. Defendants
10 falsified LBOT minutes (Exhibit 24), violating NRS 241.035.

11 PRAYER FOR RELIEF

12 45. Declaratory judgment that Defendants violated Plaintiff's rights under the U.S. and
13 Nevada Constitutions and state law.

14 46. Permanent injunction ordering Defendants to unblock Plaintiff from WCLS social
15 media and reform exclusionary policies.

16 47. Damages:

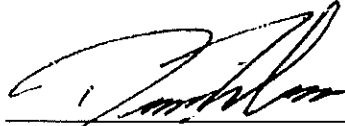
- 17 • Compensatory: \$5,000,000 (\$1,000,000 for physical injury, Exhibits 28-29;
18 \$2,000,000 for emotional distress, Exhibits 27-32; \$1,500,000 for lost income, Exhibit
19 32; \$500,000 for reputational harm, Exhibit 24).
- 20 • Punitive: \$12,000,000 for willful violations (Exhibits 1-32),
- 21 • Nominal: \$1 per violation.

22 48. Costs and attorney fees under 42 U.S.C. § 1988.

23 49. Such other relief as the Court deems just.

1 Drew J. Ribar
2 3480 Pershing Ln
3 Washoe Valley NV 89704
4 775-223-7899
5 Const2Audit@gmail.com
6 Pro Se

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8 Dated this 18th of November, 2024.

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Drew J. Ribar, Pro Se

COMPLAINT FOR VIOLATIONS OF CONSTITUTIONAL RIGHTS(42 U.S.C. § 1983, NEVADA
CONSTITUTION, NRS 379.040, AND RELATED CLAIMS) - 9

Dated: March 25, 2025

/s/ Drew J. Ribar

Drew J. Ribar, Pro Se

3480 Pershing Ln.

Washoe Valley, NV 89704

(775) 223-7899

Const2Audit@gmail.com (mailto:Const2Audit@gmail.com)

Attachments: Exhibit Index (EXH001-EXH317)

**Exhibit Index**

UNITED STATES DISTRICT COURT DISTRICT OF NEVADA - NORTHERN

DIVISION

DREW J. RIBAR v. WASHOE COUNTY, NEVADA, et al. Case No.: 3:24-cv-00526-ART-

CLB

EXHIBIT INDEX FOR FIRST AMENDED COMPLAINT

Exhibit No.	Bates Range	Description
1	EXH001- EXH005	Emails (5/12/22): Internal WCLS communications on DQSH staffing coordination.

PLEADING TITLE - 9

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA
CIVIL COVER SHEET

___ Filed ___	Received ___	Entered ___	Served On ___
Counsel/Parties of Record			
NOV 20 2024			
Clerk US District Court District of Nevada			
By: _____		Deputy _____	

I. PLAINTIFFS

Name: **Drew J. Ribar**
Address: **3480 Pershing Ln**
City/State/Zip: **Washoe Valley, NV 89704**
Telephone: **775-223-7899**
Email: **Const2Audit@gmail.com**

3:24-cv-00526

II. DEFENDANTS

- Washoe County, Nevada
- Washoe County Library System
- Build Our Center, Inc.
- Jeff Scott
- Stacy McKenzie
- Jonnica Bowen
- Library Employee Doe #1
- Jennifer Cole
- Deputy C. Rothkin (Badge #4696)
- Deputy R. Sapida (Badge #4663)
- Sgt. George Gomez (Badge #4066)
- John/Jane Does 1-10

III. COUNTY OF RESIDENCE OF FIRST LISTED PLAINTIFF

Washoe County, Nevada

IV. COUNTY OF RESIDENCE OF FIRST LISTED DEFENDANT

Washoe County, Nevada

V. BASIS OF JURISDICTION

☒ 3. Federal Question (U.S. Government Not a Party)

2	EXH006 EXH010	Emails (6/14/22): Security coordination for DQSH events between Washoe County officials and BOC.
3	EXH011 EXH012	Emails (6/24/22): Public Information Officer Jamie Hemingway discussing KUNR media access while restricting Plaintiff.
4	EXH013 EXH017	Emails (6/28/22): Reports on Proud Boys presence and increased security at library events.
5	EXH018 EXH022	Emails (6/24/22 - 7/2/22): Internal discussions about Pride event coordination with Build Our Center.
6	EXH023 EXH026	Emails (11/14/22 - 11/18/22): DQSH event organization showing preferential treatment for BOC.
7	EXH027 EXH032	Emails (1/12/23): Internal library meeting notes discussing handling of Plaintiff's recordings.
8	EXH033 EXH039	Emails (1/20/23 - 2/1/23): Communications between WCLS and BOC regarding DQSH event logistics.

PLEADING TITLE - 10

VI. NATURE OF SUIT

☒ 440. Civil Rights (Other)

VII. ORIGIN (Place an "X" in one box only)

☒ 1. Original Proceeding

VIII. REQUESTED IN COMPLAINT

☐ CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23

DEMAND: To be determined

JURY DEMAND: ☒ Yes

IX. RELATED CASE(S) IF ANY

None

X. ATTORNEYS

For Plaintiff:

Name: **Drew J. Ribar (Pro Se)**

Address: **3480 Pershing Ln**

City/State/Zip: **Washoe Valley, NV 89704**

Telephone: **775-223-7899**

Email: **Const2Audit@gmail.com**

For Defendants:

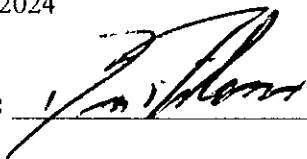
Unknown

SIGNATURE:

Dated: November 19, 2024

Signature of Plaintiff:

Name: Drew J. Ribar



9	EXH040 EXH044	Emails (2/28/23): WCLS response to media inquiries about DQSH and censorship claims.
10	EXH045 EXH061	Emails (2/27/23 - 3/22/23): RainbowFest event planning and public exclusion policies.
11	EXH062 EXH063	Meeting minutes (4/26/23): Volunteer coordination meeting for Pride and DQSH events.
12	EXH064 EXH069	Notes (5/5/23): RainbowFest volunteer discussions about restricting access.
13	EXH070 EXH071	Emails (5/10/23): Internal discussions among Friends of the Library regarding public concerns.
14	EXH072 EXH074	Emails (6/7/23): Reno Library DQSH event planning notes.
15	EXH075 EXH083	Public records request (7/6/23): Documents related to library policies on access restrictions.

PLEADING TITLE - 11

16	EXH084	Transcript (4/17/24): Plaintiff's public comments at LBOT meeting.
17	EXH085 EXH092	Minutes (4/17/24): Falsified LBOT meeting minutes misrepresenting Plaintiff's statements.
18	EXH093 EXH142	Transcript (6/15/24): AI- generated transcription of North Valleys Library event.
19	EXH143 EXH149	Email (8/14/24): Plaintiff's Notice of Appeal regarding suspension.
20	EXH150 EXH156	Email (8/14/24): Response from LBOT confirming suspension despite lack of due process.
21	EXH157 EXH164	Emails (8/15/24): Additional correspondence on suspension appeal and evidence requests.
22	EXH165 EXH178	Emails (8/16/24): Public records requests and due process concerns for LBOT hearing.

PLEADING TITLE - 12

23	EXH179 EXH189	Email (8/16/24): Herbert Kaplan's response to Plaintiff's appeal notice.
24	EXH190 EXH277	Transcript (8/21/24): LBOT meeting where Plaintiff's suspension was upheld.
25	EXH278	Email (8/24/24): YouTube privacy complaint against Plaintiff's video.
26	EXH279 EXH311	Transcript (11/12/24): South Valleys Library incident where Plaintiff was detained.
27	EXH312	Video (6/15/23): Rend Library DQSH - Plaintiff's attempts to document event.
28	EXH313	Video (7/15/23): Sparks Library DQSH - Jeff Scott blocking and assaulting Plaintiff.
29	EXH314	Video (6/15/24): North Valleys Library DQSH - Thanh Nguyen assaulting Plaintiff.

30	EXH315	Video (6/20/24): Reno Library suspension notice served to Plaintiff.
31	EXH316	Video (8/21/24): LBOT meeting upholding Plaintiff's suspension.
32	EXH317	Video (11/12/24): South Valleys Library - Plaintiff unlawfully detained by deputies.

Note: Video files (Exhibits 27-32) are submitted separately per Northern District of Nevada
electronic filing procedures.